

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA : CRIMINAL NO. _____

v. : DATE FILED: _____

STERLIN JENKINS : VIOLATIONS:
: 18 U.S.C. § 371 (conspiracy to commit
: armed bank robbery - 1 count)
: 18 U.S.C. § 2113(d) (armed bank robbery
: - 1 count)
: 18 U.S.C. § 2113(a) (bank robbery - 1
: count)
: 18 U.S.C. § 924(c) (use of a firearm
: during the commission of a violent felony
: - 1 Count)
: 18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Citizens Bank (“Citizens”) was a federally insured bank with a branch office located at 15 S. 52nd Street in Philadelphia, Pennsylvania (“the 52nd Street branch”).
2. From in or about January of 2002 to on or about February 16, 2002, in the Eastern District of Pennsylvania, defendant

STERLIN JENKINS

conspired and agreed, together with Sheree White, a co-conspirator indicted elsewhere, and unindicted co-conspirators “J.W.”, “R.S.” and an unidentified individual, to commit an armed

bank robbery, in violation of Title 18, United States Code, Sections 2113 (d), and 2, that is, the robbery of Citizens Bank, 15 S. 52nd Street in Philadelphia, Pennsylvania.

MANNER AND MEANS

It was a part of the conspiracy that:

3. J.W. maintained a romantic involvement with Sheree White in order to obtain information about the security and operational procedures in place at the 52nd Street branch, in order to determine the best way to rob that bank.

4. The bank robbery was timed to occur shortly after a delivery of cash to the bank by armored car.

5. J.W. enlisted the aid of defendant **STERLIN JENKINS** to act as a getaway driver for R.S. and an individual unknown to the grand jury (“the Unknown Subject”).

OVERT ACTS

In furtherance of the conspiracy, defendant **STERLIN JENKINS**, and others known and unknown to the grand jury, committed the following overt acts in the Eastern District of Pennsylvania and elsewhere:

On or about February 12, 2002:

1. R.S., who was brandishing a silver-colored handgun, and the Unknown Subject entered the 52nd Street branch moments after an armored car delivery of \$125,000 was made to the bank wearing masks and disguises to conceal their faces.

2. R.S. approached the head teller, who had exclusive access to the two internal bank vaults where the armored car delivery was deposited, and demanded that the head teller accompany R.S. to the vault.

3. R.S., once reaching the vault area with the head teller, demanded that the head teller open the vaults, which the teller did, and R.S. then removed in excess of \$291,000 from the vaults.

4. After R.S. and the Unknown Subject stole in excess of \$291,000, they left the bank..

5. Defendant **STERLIN JENKINS** drove R.S. and the Unknown Subject from the vicinity of the Citizens Bank to a location in lower Northeast Philadelphia for the purpose of dividing the money taken in the Citizens Bank robbery.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 12, 2002, in the Eastern District of Pennsylvania, defendant

STERLIN JENKINS

and Sheree White, charged elsewhere, J.W., R.S., and another individual unknown to the grand jury, knowingly and unlawfully, by force and violence, and by intimidation, took, and aided and abetted the taking, from employees of the Citizens Bank, 15 S. 52nd Street, Philadelphia, Pennsylvania (hereafter “the Bank”), lawful currency of the United States, belonging to, and in the care, custody, control, management and possession of the Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation, and, in so doing, Sheree White, J.W., R.S. and another individual unknown to the grand jury, and defendant **JENKINS** knowingly and unlawfully assaulted and put in jeopardy the lives of the employees of the Bank, and other persons, by use of dangerous weapons, including a silver-colored semiautomatic handgun.

In violation of Title 18, United States Code, Sections 2113(d) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 12, 2002, in the Eastern District of Pennsylvania, defendant

STERLIN JENKINS

and Sheree White, charged elsewhere, J.W., R.S., and another individual unknown to the grand jury, knowingly and unlawfully, by force and violence, and by intimidation, took, and aided and abetted the taking, from employees of the Citizens Bank, 15 S. 52nd Street, Philadelphia, Pennsylvania (hereafter “the Bank”), lawful currency of the United States, belonging to, and in the care, custody, control, management and possession of the Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation.

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about February 12, 2002, in the Eastern District of Pennsylvania, defendant

STERLIN JENKINS

and Sheree White, charged elsewhere, J.W., R.S., and another individual unknown to the grand jury, used and carried, and aided and abetted the use and carrying of, a firearm, that is, a silver-colored semiautomatic handgun, during and in relation to a crime of violence for which they may be prosecuted in a Court of the United States, that is, the bank robbery of the Citizens Bank, 15 S. 52nd Street, Pennsylvania, in violation of Title 18, United States Code, Sections 2113(a), 2113(d), and 2.

In violation of Title 18, United States Code, Sections 924(c) and 2.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney

